

**REMARKS**

***Summary of the Amendment***

Upon entry of the above amendment, the drawings and the specification will have been amended. Claims 13, 18, 24, 28, 30, 32-34, 51 and 52 will also have been amended. Additionally, claim 53 will have been added. Accordingly, claims 13-53 will be pending, with claims 13, 28, 32, 34 and 51-53 being in independent form.

***Summary of the Official Action***

In the Office action, the Examiner objected to the drawings and the specification. The Examiner also rejected claim 30 as indefinite. Additionally, claims 13-27, 29-31 and 35-52 were rejected over the applied art of record. Finally, the Examiner indicated that claims 28 and 32-34 contain allowable subject matter and would be allowable is presented in independent form. By the present amendment and remarks, Applicant submits that the objections and rejections have been overcome, and respectfully requests reconsideration of the outstanding Office Action and allowance of the present application.

***Interview of March 30, 2004***

Applicant appreciates the courtesy extended by Examiner Lindsey in the interview of March 30, 2004. In that interview, Applicant's representative discussed, among other things,

that Applicant would address the drawing and specification objections by Amendment.

It was also emphasized that the applied prior art documents failed to disclose or suggest, among other things, hooking pins 15 arranged on the shell 2 and that the first and second accessories have locking pieces 16 that detachably engage and receive the pins 15.

The Examiner disagreed and explained that the device 12 in Figs. 5 and 6 of BAUDOU could possibly be characterized as a pin.

Applicant also pointed out that col. 3, lines 65-67 of BAUDOU characterizes the devices 11 as cylinders that receive studs, and that Fig. 1 clearly shows such cylinder devices 11 functioning as receiving devices and not as pins. In response, the Examiner agreed to consider such arguments in a timely-filed amendment.

### ***Status of the Certified Priority Document***

The Examiner has acknowledged Applicant's claim to foreign priority, but indicated on the form PTOL-326 that "None of" of the certified copies of the priority documents have been received from the PCT International Bureau.

Applicant directs the Examiner's attention to MPEP 1828 which indicates that, with regard to a U.S. National Stage Application, it is not Applicant's responsibility to provide the same when the priority document has been filed with the PCT International Bureau.

For the Examiner's convenience, Applicant is attaching hereto a form PCT/IB/304

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which clearly indicates that a copy of the priority document was filed with the PCT International Bureau on July 17, 2001.

Accordingly, Applicant respectfully requests that the Examiner indicate such acknowledgment on form PTO-326 in the next office action.

***Objection to the drawings, is Moot***

The Examiner objected to the drawings because reference number 30 was used to designate more than one feature.

By this amendment, it is believed that this issue has been addressed. Specifically, Applicant has herein amended the specification and drawings to specifically resolve this objection.

Accordingly, the objection is believed to be rendered moot and the Examiner is requested to withdraw this objection.

***Objection to the specification, is Moot***

The Examiner objected to the specification because reference number 30 was used to describe two different features.

By this amendment, it is believed that this issue has been addressed. Specifically, Applicant has herein amended the specification and drawings to specifically resolve this

objection.

Accordingly, the objection is believed to be rendered moot and the Examiner is requested to withdraw this objection.

***The Indefiniteness Rejection, is moot***

Claim 30 was rejected under 35 U.S.C. § 112, second paragraph, as being indefinite on the basis of a minor informality.

By this Amendment, Applicant submits that this issue has been resolved. Specifically, claim 30 has been amended to render its language more consistent with the language of claim 26.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the rejection of this claim under 35 U.S.C. § 112, second paragraph.

***Traversal of Rejections Under 35 U.S.C. § 102***

***Over Baudou***

Applicant traverses the rejection of claims 13, 15-17, 24, 26, 27, 29-31, 37, 43 and 50-52 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,623,730 to BAUDOU et al.

The Examiner asserted that this document discloses all the features recited in these

claims including the connecting and locking system. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what BAUDOU discloses, Applicant submits that this document fails to disclose, or even suggest, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second support structures, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 51, and inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the support structure and the protective screen, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 52.

Applicant does not dispute that the figures of BAUDOU show a helmet with a connection system. For example, Fig. 1 shows an accessory connected to a helmet via connections 11/21 and 12/22. However, Applicant submits that this connection arrangement

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utilizes receiving cylinders 11 and 12 arranged on the helmet and studs 21 and 22 arranged on the accessory. Accordingly, Applicant submits that such an arrangement cannot properly be characterized a connecting and locking system which *comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins, and/or which comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second support structures, wherein the locking pieces detachably engage and receive the hooking pins, and/or which comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the support structure and the protective screen, wherein the locking pieces detachably engage and receive the hooking pins.*

Thus, Applicant submits that the above-noted claims are not disclosed, or even suggested, by any proper reading of BAUDOU.

Applicant further notes that, for an anticipation rejection under 35 U.S.C. § 102(b) to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Because BAUDOU fails to disclose at least the above mentioned features as recited in independent claims 13, 51 and 52, Applicant submits that BAUDOU does not disclose all the claimed features recited in at least independent claims 13, 51 and 52.

Furthermore, Applicant submits that dependent claims 15-17, 24, 26, 27, 29-31, 37, 43 and 50 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of BAUDOU discloses or suggests, in combination: that at least one of the first and second accessories comprises a support structure for an optronic device as recited in claim 15; that the optronic device comprises a night-vision device as recited in claim 16; that only when the first accessory is removed can the second accessory be removably connected to the main outer shell via the connecting and locking system, and wherein, only when the second accessory is removed can the first accessory be removably connected to the main outer shell via the connecting and locking system as recited in claim 17; that each of the first and second accessories have two locking pieces which each comprise a hooking and locking piece as recited in claim 24; that each hooking and locking piece comprises a lock device which is at least one of pivotally and movably mounted as recited in claim 26; that the lock device is biased by an elastic system as recited in claim 27; that each hooking and locking piece comprises an open slot as recited in claim 29; that each lock device is connected to each hooking and locking piece via a journal as recited in claim 30; that the lock device comprises a locking projection as recited in claim 31; that at least one of the first and second accessories comprises an ocular protective screen as recited in claim 37; that at least one of the first and second accessories

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comprises a support structure and further comprising a protective screen as recited in claim 43; and that at least one of the first and second accessories comprises a protective screen as recited in claim 50.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

Over Beautz

Applicant traverses the rejection of claims 13 and 15-24 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application No. 2002/0020004 to BEAUTZ.

The Examiner asserted that this document discloses all the features recited in these claims including the connecting and locking system. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what BEAUTZ discloses, Applicant submits that this document fails to disclose, or even suggest, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13.

Applicant does not dispute that the figures of BEAUTZ show a helmet with a



connection system. However, it is clear that the connection system 40/20 is utilized to connect an outer helmet and not an accessory (see Abstract). Applicant also does not dispute that Fig. 4 shows a fixture which can be temporarily connected to a helmet via connections 34 and 14. However, Applicant submits that this fixture connection arrangement merely utilizes guiding flanges 34 which are arranged on the fixture. Such flanges 34 cannot properly be characterized as locking pieces, i.e., it is apparent that these flanges 34 do not lock the fixture to the helmet. Accordingly, Applicant submits that such an arrangement cannot properly be characterized a connecting and locking system which comprises hooking pins arranged on the main outer shell *and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*. Applicant emphasizes that the flanges 34 do not function to lock the accessory to the helmet

Thus, Applicant submits that the above-noted claims are not disclosed, or even suggested, by any proper reading of BEAUTZ.

Applicant further notes that, for an anticipation rejection under 35 U.S.C. § 102(e) to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Because BEAUTZ fails to disclose at least the above mentioned features as recited in independent claim 13, Applicant submits that BEAUTZ does not disclose all the claimed

features recited in at least independent claim 13.

Furthermore, Applicant submits that dependent claims 15-24 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of BEAUTZ discloses or suggests, in combination: that at least one of the first and second accessories comprises a support structure for an optronic device as recited in claim 15; that the optronic device comprises a night-vision device as recited in claim 16; that only when the first accessory is removed can the second accessory be removably connected to the main outer shell via the connecting and locking system, and wherein, only when the second accessory is removed can the first accessory be removably connected to the main outer shell via the connecting and locking system as recited in claim 17; that the hooking pins comprises first and second hooking pins arranged on sides of the main outer shell and wherein the locking pieces comprise first and second hooking and locking pieces arranged on sides of each of the first and second accessories as recited in claim 18; that the first and second hooking pins are fixed to the main outer shell as recited in claim 19; that the first and second hooking and locking pieces are fixed to each of the first and second accessories as recited in claim 20; that the first and second hooking pins are arranged to extend outwardly on both sides of corresponding lateral walls of the main outer shell along a transverse axis as recited in claim 21; that each of the first and second hooking

pins are cylindrically shaped as recited in claim 22; that each of the first and second hooking pins comprise a hooking groove adapted to cooperate with a corresponding hooking piece of each of the first and second accessories as recited in claim 23; and that each of the first and second accessories have two locking pieces which each comprise a hooking and locking piece as recited in claim 24.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

***Traversal of Rejections Under 35 U.S.C. § 103(a)***

***Over Baudou with Olt***

Applicant respectfully traverses the rejection of claims 14, 38-42 and 44-49 under 35 U.S.C. § 103(a) as unpatentable over BAUDOU in view of US patent 3,315,272 to OLT et al.

The Examiner acknowledged that BAUDOU lacks, among other things, an accessory that is a clear visor, a tinted visor, a support structure, or a pivotal protective screen. However, the Examiner asserted that such features are disclosed in OLT and that it would have been obvious to combine the teachings of these documents. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what these documents disclose or

suggest, Applicant submits that no proper combination of BAUDOU and OLT discloses or suggests, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13.

As explained above, the connection arrangement of BAUDOU utilizes receiving cylinders 11 and 12 arranged on the helmet and studs 21 and 22 arranged on the accessory. Such an arrangement cannot properly be characterized a connecting and locking system which *comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*.

It is also clear that OLT merely shows a helmet which uses a sliding connection system for an accessory. However, it is clear that the disclosed connection system cannot properly be characterized as utilizing *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*.

Moreover, Applicant submits that it would not have been obvious to modify BAUDOU in view of OLT since such a combination, even if proper (which Applicant submits it would not be) would nevertheless lack any disclosure or suggestion with regard

*to hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Thus, Applicant submits that the above-noted documents fail to disclose or suggest the features recited in at least amended independent claim 13. Because no proper combination of the above-noted documents disclose or suggest at least the above-noted features of the instant invention, Applicant submits that no proper combination of these documents can render unpatentable the combination of features recited in at least independent claim 13.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify any of the applied documents in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify these documents, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 13 is not rendered obvious by any reasonable inspection of these disclosures.

Furthermore, Applicant submits that dependent claims 14, 38-42 and 44-49 are allowable at least for the reason that these claims depend from an allowable base claim and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of BAUDOU and OLT discloses or

suggests, in combination: that at least one of the first and second accessories comprises a clear visor, a tinted visor, and a support structure as recited in claim 14; that ocular protective screen is pivotally movable about a transverse axis with respect to the main outer shell between at least two positions as recited in claim 38; that one of the at least two positions is a lowered active position of use, whereby the ocular protective screen is arranged in front of a user's eyes, and wherein another of the at least two positions is a raised inactive position of use, whereby the ocular protective screen is arranged above a portion of the main outer shell as recited in claim 39; that the ocular protective screen is guided in a center of the helmet by a guiding and locking carriage as recited in claim 40; that the guiding and locking carriage is movable in a central slide as recited in claim 41; that the central slide is disposed on the main outer shell as recited in claim 42; that the helmet further comprises a space arranged between the support structure and the protective screen as recited in claim 44; that each of the support structure and the protective screen are movably mounted to the main outer shell as recited in claim 45; that the protective screen is arranged between the support structure and the main outer shell as recited in claim 46; that the support structure comprises at least one opening as recited in claim 47; that at least one of the support structure and the protective screen is connected to a guiding carriage as recited in claim 48; and that the support structure comprises at least one opening as recited in claim 49.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the

above-noted rejection under 35 U.S.C. § 103(a) and indicate that these claims are allowable over the applied art of record.

Over Baudou alone

Applicant respectfully traverses the rejection of claim 25 under 35 U.S.C. § 103(a) as unpatentable over BAUDOU alone.

The Examiner acknowledged that BAUDOU lacks, among other things, a metal bar. However, the Examiner asserted that such features are within the ordinary skill level of one having ordinary skill in the art. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what this document discloses or suggests, Applicant submits that no proper modification of BAUDOU discloses or suggests, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13.

As explained above, the connection arrangement of BAUDOU merely utilizes receiving cylinders 11 and 12 arranged on the helmet and studs 21 and 22 arranged on the accessory. Such an arrangement cannot properly be characterized a connecting and locking system which *comprises hooking pins arranged on the main outer shell and locking pieces*

*arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Moreover, Applicant submits that it would not have been obvious to modify BAUDOU as suggested by the Examiner since such a modification, even if proper (which Applicant submits it would not be) would nevertheless lack any disclosure or suggestion with regard to *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Thus, Applicant submits that the above-noted document fails to disclose or suggest the features recited in at least amended independent claim 13. Because no proper modification of the above-noted document discloses or suggests at least the above-noted features of the instant invention, Applicant submits that no proper modification of this document can render unpatentable the combination of features recited in at least independent claim 13.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify the applied document in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify this document, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 13 is not



rendered obvious by any reasonable inspection of this disclosure.

Furthermore, Applicant submits that dependent claim 25 is allowable at least for the reason that this claim depends from an allowable base claim and because this claim recites additional features that further define the present invention. In particular, Applicant submits that no proper reading of BAUDOU discloses or suggests, in combination: that each hooking and locking piece comprises a metal bar as recited in claim 25.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that this claim is allowable over the applied art of record.

Over Baudou with Docking

Applicant respectfully traverses the rejection of claim 35 under 35 U.S.C. § 103(a) as unpatentable over BAUDOU in view of US patent 4,457,461 to DOCKING et al.

The Examiner acknowledged that BAUDOU lacks, among other things, an accessory made of a composite material. However, the Examiner asserted that such is disclosed in DOCKING and that it would have been obvious to combine the teachings of these documents. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what these documents disclose or suggest, Applicant submits that no proper combination of BAUDOU and DOCKING

discloses or suggests, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13.

As explained above, the connection arrangement of BAUDOU utilizes receiving cylinders 11 and 12 arranged on the helmet and studs 21 and 22 arranged on the accessory. Such an arrangement cannot properly be characterized a connecting and locking system which *comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*.

It is also clear that DOCKING merely shows a flexible strap connection system for connecting an accessory to a helmet. However, it is clear that the disclosed connection system cannot properly be characterized as utilizing *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*.

Moreover, Applicant submits that it would not have been obvious to modify BAUDOU in view of DOCKING since such a combination, even if proper (which Applicant submits it would not be) would nevertheless lack any disclosure or suggestion with regard to *hooking pins arranged on the main outer shell and locking pieces arranged on each of the*

*first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Thus, Applicant submits that the above-noted documents fail to disclose or suggest the features recited in at least amended independent claim 13. Because no proper combination of the above-noted documents disclose or suggest at least the above-noted features of the instant invention, Applicant submits that no proper combination of these documents can render unpatentable the combination of features recited in at least independent claim 13.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify any of the applied documents in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify these documents, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 13 is not rendered obvious by any reasonable inspection of these disclosures.

Furthermore, Applicant submits that dependent claim 35 is allowable at least for the reason that this claim depends from an allowable base claim and because this claim recites additional features that further define the present invention. In particular, Applicant submits that no proper reading of BAUDOU and DOCKING discloses or suggests, in combination: that at least one of the first and second accessories comprises a semi-spherical shaped wall

made of a composite material as recited in claim 35.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that this claim is allowable over the applied art of record.

Over Baudou with Docking and Olt

Applicant respectfully traverses the rejection of claim 36 under 35 U.S.C. § 103(a) as unpatentable over BAUDOU in view of DOCKING et al. and further in view of OLT.

The Examiner acknowledged that BAUDOU/DOCKING lacks, among other things, an accessory that is triangular in shape. However, the Examiner asserted that such is disclosed in OLT and that it would have been obvious to combine the teachings of these documents. Applicant respectfully traverses this rejection.

Notwithstanding the Office Action assertions as to what these documents disclose or suggest, Applicant submits that no proper combination of BAUDOU, DOCKING and OLT discloses or suggests, inter alia, a protective helmet comprising a connecting and locking system *comprising hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins*, as recited in amended independent claim 13.

As explained above, the connection arrangement of BAUDOU utilizes receiving

cylinders 11 and 12 arranged on the helmet and studs 21 and 22 arranged on the accessory. Such an arrangement cannot properly be characterized a connecting and locking system which *comprises hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

It is also clear that DOCKING merely shows a flexible strap connection system for connecting an accessory to a helmet. However, it is clear that the disclosed connection system cannot properly be characterized as utilizing *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Finally, as explained above, OLT merely shows a helmet which uses a sliding connection system for an accessory. It is clear that the disclosed connection system cannot properly be characterized as utilizing *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Applicant submits that it would not have been obvious to modify BAUDOU in view of DOCKING and OLT since such a combination, even if proper (which Applicant submits it would not be) would nevertheless lack any disclosure or suggestion with regard to *hooking pins arranged on the main outer shell and locking pieces arranged on each of the first and*

*second accessories, wherein the locking pieces detachably engage and receive the hooking pins.*

Thus, Applicant submits that the above-noted documents fail to disclose or suggest the features recited in at least amended independent claim 13. Because no proper combination of the above-noted documents disclose or suggest at least the above-noted features of the instant invention, Applicant submits that no proper combination of these documents can render unpatentable the combination of features recited in at least independent claim 13.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify any of the applied documents in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify these documents, in the manner suggested by the Examiner. Therefore, Applicant submits that the invention as recited in at least independent claim 13 is not rendered obvious by any reasonable inspection of these disclosures.

Furthermore, Applicant submits that dependent claim 36 is allowable at least for the reason that this claim depends from an allowable base claim and because this claim recites additional features that further define the present invention. In particular, Applicant submits that no proper reading of BAUDOU, DOCKING and OLT discloses or suggests, in combination: that the semi-spherical shaped wall has a substantially triangular shape as

recited in claim 36.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that this claim is allowable over the applied art of record.

***Acknowledgment of Allowable Subject Matter***

Applicant acknowledges and appreciates the Examiner's indication that claims 28 and 32-34 contain allowable subject matter and would be allowable if written in independent form. Accordingly, as Applicant has presented claims 28, 32 and 34 in independent form, Applicant requests that at least claims 28 and 32-34 be indicated to be allowed.

***New Claim is also Allowable***

Applicant submits that new claim 53 is also allowable over the applied art of record. Specifically, claim 53 recites a combination of features which are clearly not disclosed or suggested by the applied art of record.

Accordingly, Applicant respectfully requests consideration of these claims and further request that the above-noted claims be indicated as being allowable.

### **CONCLUSION**

Applicant respectfully submits that each and every pending claim of the present invention meets the requirements for patentability under 35 U.S.C. § § 112, 102 and 103 and respectfully requests the Examiner to indicate allowance of each and every pending claim of the present invention.

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the Applicant's invention, as recited in each of the pending claims. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

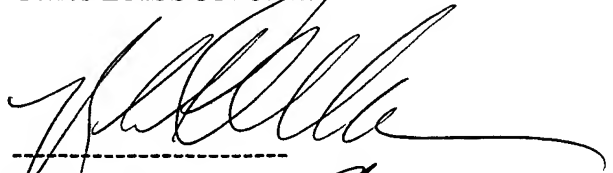
The Commissioner is hereby authorized to charge any fees necessary for consideration of this amendment to deposit account No. 19-0089.



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Should the Examiner have any further comments or questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
Gilles BASSON et al.

  
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